

Thank you for the opportunity to comment on the standards of certification for Patient-Centered Medical Homes. Sturdy Memorial Associates (SMA) is a multi-specialty group practice consisting of 61 physicians including 35 primary care physicians. The SMA primary care physicians operate out of 12 different sites serving a combined 8 towns in southeastern Massachusetts as well as towns in nearby Rhode Island. All 12 sites are recognized by the National Committee for Quality Assurance (NCQA) as patient-centered medical homes (PCMH) at the highest level of achievement, level 3. SMA is supported by a robust electronic medical record (EMR) which was implemented almost 10 years ago. All SMA primary care physicians have qualified for EMR "Meaningful Use" incentives in each of the years they have been eligible (3 years for most providers) and are currently on track to qualify for Meaningful Use II payments which are based on elevated standards.

In general, we support the PCMH Certification Pathway as described in the attachment to your letter, dated March 5, 2014, requesting comments. However, we are concerned that there is no mention of NCQA recognition as an alternative means to qualifying for PCMH status as the legislation intended (Chapter 224, Section 14(b), (h), and (i)). The NCQA application process, like the standards you have proposed, is comprehensive and rigorous. We have invested many hours in preparing those applications and making adjustments to our operations to meet the NCQA standards. The NCQA application can result in 3 levels of achievement which, while not identical to the 3 levels you have proposed, are generally equal in achievement.

We respectfully request that the Patient-Centered Medical Home standards of certification explicitly reference the 3 levels of NCQA recognition, as equal alternatives, to the 3 levels of achievement the Health Policy Commission proposes in its PCMH Certification Pathway.

Thank-you

Pam Miale, Director of Operations and Clerk, Sturdy Memorial Associates